

**BitMart Institutional Account**

**Anti-Money Laundering Questionnaire**

**BitMart 机构账户反洗钱问卷**

**Application Date**:

申请日期：

**Entity Name:**

机构名称：

Please answer the following questions regarding your Anti-Money Laundering Program:

请回答以下有关贵司反洗钱工作方面的问题：

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| Question 问题 | | Yes  是 | No  否 | Note (if any)  备注（如有） |
| General AML/KYC Policy  总体AML/KYC政策 | | | | |
| 1 | Does your company have an AML/KYC policy?  贵司是否制定了AML/KYC政策？ | Y | N |  |
| 2 | Is the AML/KYC policy approved by the company’s board or a senior committee?  AML/KYC政策是否经公司董事会或高管层批准？ |  |  |  |
| 3 | Does the company have a designated officer that is responsible for coordinating and overseeing the AML/KYC framework?  是否有一名专职人员负责协调和监督AML/KYC框架？ |  |  |  |
| 4 | Has the company developed written policies documenting the processes have in place to prevent, detect and report suspicious transactions?  是否制定了书面政策记录业务流程，以防止、监测并报告可疑交易？ |  |  |  |
| 5 | In addition to inspections by the government  supervisors/regulators, is the company’s AML/KYC policy reviewed by auditors or independent third parties on a regular basis?  除政府机构/监管机构进行的检查以外，AML/KYC政策是否定期经审计师或独立第三方审计？ |  |  |  |
| 6 | Does the company have a policy prohibiting accounts/relationships with shell banks? (A shell bank is defined as a bank incorporated in a jurisdiction in which it has no physical presence and which is unaffiliated with a regulated financial group.)  公司是否禁止与空壳银行建立账户关系/发生业务往来？（空壳银行是指在其司法管辖区内没有实体存在且不隶属于受监管的金融集团的银行。） |  |  |  |
| 7 | Does the company have policies covering relationships with Politically Exposed Persons (PEPs), their family and close associates?  公司是否有相关政策处理公司与政治公众人物（PEPs）及其家属和亲密伙伴的关系？ |  |  |  |
| 8 | Does the company have record retention procedures that comply with applicable law?  公司是否有符合相关适用法律的记录保存程序？ |  |  |  |
| Risk Assessment  风险评估 | | | | |
| 9 | Does the company have a risk-based assessment of its customer baseand their transactions?  公司是否对其客户及其交易进行了以风险为导向的评估？ |  |  |  |
| 10 | Does the company determine the appropriate level of enhanced duediligence necessary for those categories of customers andtransactions that the company has reason to believe pose aheightened risk of illicit activities at or through the company?  若公司有理由认为某类客户风险增加，如在本公司的交易或通过本公司进行的交易属于非法活动，公司是否有适当的强化尽职调查程序？ |  |  |  |
| Know Your Customer  了解你的客户 | | | | |
| 11 | Has the company implemented processes for the identification of customers on whose behalf it maintains or operates accounts or conducts transactions?  对于本公司为其开立账户、运营账户或进行交易的客户，公司是否执行了相应的客户识别程序？ |  |  |  |
| 12 | Does the company have a requirement to collect information regarding its customers’ business activities?  公司是否要求收集客户业务活动的信息？ |  |  |  |
| 13 | Does the company have a process to review and, where appropriate, update customer information relating to high-risk client information?  公司是否有审查并适时更新与高风险客户相关的客户信息的流程？ |  |  |  |
| 14 | Does the company have procedures to establish a record for each new customer noting their respective identification documents and ‘Know Your Customer’ information?  公司是否为每个新客户建立客户记录，包括身份证明文件和KYC信息？ |  |  |  |
| 15 | Does the company complete a risk-based assessment to understand the normal and expected transactions of its customers?  公司是否进行以风险为导向的评估，以了解客户可能出现的正常和预期交易？ |  |  |  |
| Reportable Transactions and Prevention and  Detection of Transactions with Illegally Obtained Funds  须报告的交易与预防  及关于非法获得的资金进行的交易的识别 | | | | |
| 16 | Does the company have policies or practices for the identification and reporting of transactions that are required to be reported to the authorities?  公司是否有识别或上报须向政府部门报告的交易的政策或做法？ |  |  |  |
| 17 | Does the company screen customers and transactions against lists of persons, entities or countries issued by government/competent authorities? For example, the SDN lists of OFAC, U.S.  公司是否根据政府/有权机构发布的人员、实体或国家列表对客户和交易进行过滤筛查？例如，美国OFAC的SDN制裁名单。 |  |  |  |
| 18 | Does the company have a monitoring program for unusual and potentially suspicious activities that cover funds transfers and monetary instruments such as travelers checks, money orders, etc.?  针对资金划转和货币工具（如旅行支票、汇票等）的异常和潜在可疑活动，公司是否有监控程序？ |  |  |  |
| AML/KYC Training  AML/KYC 培训 | | | | |
| 19 | Does the company provide AML/KYC trainings to relevant employees that include:  § Identification and reporting of transactions that must be reported to government authorities.  § Examples of different forms of money laundering involving the company’s products and services.  § Internal policies to prevent money laundering.  公司是否向相关员工提供AML/KYC培训，包括：  §识别和报告必须报告给政府部门的交易。  §涉及公司产品和服务的不同形式的洗钱风险实例。  §反洗钱内部政策。 |  |  |  |
| 20 | Does the company have record retention procedures for such training and training records?  公司对此类培训和培训记录等相关信息是否进行留存？ |  |  |  |

**Certification**: I hereby certify that all information provided above are true and correct to the best of my knowledge. I understand and agree that BitMart has the sole discretion to determine whether to open the corporate account, which will be subject to BitMart’s User Agreement, Privacy Policy, AML/KYC Policy and additional covenants, which may be updated and modified from time to time at the sole discretion of BitMart.

**声明：**本人特此声明，上述所有信息均真实无误。本人理解并同意，BitMart对是否开立公司账户具有唯一决定权，而此决定将受到BitMart的用户协议、隐私政策、AML/KYC政策和其他要求的约束。BitMart有权在任何时候单方面决定更新和修订这些条款。

Name:

姓名：

Title:

职务：

Signature：

签名：